

BellSouth still has not provided a fully functioning parsed CSR

Update

- **At least seven defects from the January 5 implementation remain to be corrected.**
- **BellSouth did not provide “workarounds” in a timely manner and the workarounds themselves are burdensome.**
 - Exceeded three day requirement
 - Post dated publication
 - Required interpretation of unparsed CSR data and manual reentry
- **CLEC Assistance Program mentioned in filing was only announced to CLECs on February 13.**
- **There is no dispute that BellSouth’s CSR contains the information necessary to populate at least 11 additional fields**
 - These fields should have been available on January 5
 - Other ILECs provide these fields
 - BellSouth self-initiated change requests to implement at least 6 of these fields (CR0561 and CR0562) in March
 - Cites regulatory mandate from Florida
 - Reclassifies as CLEC initiated
 - Abandons effort and attempts to force CLECs to approve their actions
- **BellSouth’s claims concerning the various letters and tests submitted with its application appear to be overstated.**
 - ITC DeltaCom
 - Birch
 - Exceleron
 - Telcordia
 - KPMG

BellSouth excessive reliance on manual processing of orders has not improved

Update

- **In December 2001 only 57% of CLEC LSRs resulted in the creation of fully mechanized service orders**
- **In total 1/3 of all CLEC orders still receive manual processing at the LCSC**
- **There was no improvement in flow through or the design and operation of BellSouth's CLEC ordering interfaces in 2001**
- **During October and November AT&T received invalid clarifications for USOCs on 203 PONS impacting 619 customer lines**
 - BellSouth's explanation was that some error had been made in the table for the state of Florida associated with converting a customer from retail to UNE-P
- **BellSouth's LCSC introduces errors on service requests causing incorrect provisioning of AT&T's UNE-P orders**
 - Service orders re-typed by LCSC service reps do not match what AT&T requested on the LSR
- **BellSouth provides incomplete manual clarifications resulting in serial clarifications that lead to delayed implementation for AT&T customers**
 - Manual clarifications do not address all errors existing on an LSR (the first time the clarification is sent)
 - Subsequent LSRs are rejected for additional errors that existed on the original LSR
- **BellSouth delays the delivery of UNE P to AT&T's customers who have an ADSL USOC appearing on their CSR.**
 - Our customers tell us they do not have ADSL and so do not know why the ADL11 USOC would be on their BellSouth account.
 - AT&T calls the BellSouth DSL Services Group as directed by BellSouth to identify the DSL provider.
 - This BellSouth DSL group addresses questions about status DSL orders and Tech issues. The BellSouth employees that answer this toll-free number do not know the answer to our questions nor do they know where we can get answers.

- **BellSouth's delays in updating Customer Service Records following order completion result in double billing and impair CLECs ability to provide additional service to new customers.**
 - Overnight – 72 hours and later
 - FPSC has requested additional CLEC input

BellSouth's claimed "improvements" to the Change Management Process are paper promises and BellSouth continues to ignore key requirements of the process

- **BellSouth claims some two dozen initiatives implemented in "recent months"**
 - Just in time for filing
 - Could have been done at any time in the past
 - Long sought by the CLECS
 - Do not directly address the failure of the process to implement change requests in a timely manner or effectively
- **The present Feature Change Request Back Log is 93**
 - Existing process at historical performance will not clear this back log until 2005
 - No BellSouth proposals change the process that lead to this situation
- **The present Defect Change Request Back Log is 33**
 - The effort and resources required to correct faulty software reduces the effort and resources available to implement additional changes
- **A CLEC proposal (Red-line) to remedy the deficiencies leading to the current situation has been submitted to the GA PSC as requested by the GA Staff.**
- **BellSouth provided a partial response on 2/12 and a full reply (Green-line) was filed with the GA PSC on 2/15.**
 - The 2/12 partial response is inadequate
 - CLEC requests to discuss the Red-line on this call had been denied
 - BellSouth added discussion of its proposal to the agenda at 5:20 pm on that night before the call
 - BellSouth's proposal continues to offer inappropriate "allocation" of resources and includes caveats that make it meaningless
 - BellSouth's proposal provides CLECs a blank windshield and a lighted, edited rearview mirror – a limited partial forecast and quarterly historical data on a post implementation basis
 - The 2/15 reply contains all of the inadequacies of the 2/12 partial response and reveals additional restrictive interpretations of its obligations and offerings

- Borrowed language from Verizon plan includes terms which BellSouth defines differently from the CLECs
- “Where possible”, “as possible”, “subject to availability”, “within the scope of the CCP” are used repeatedly to negate commitments
- Key areas of disagreement include:
 - Definition of the scope of the CCP
 - Definition of “CLEC Affecting Change”
 - Prioritization and scheduling of all CLEC and BellSouth initiated changes
 - Commitment of resources to achieve timely implementation
 - CLEC visibility into the entire process
- **BellSouth will need to comply with CCP procedures for any improvement to occur – historically BellSouth’s compliance has been spotty.**